5929 Balcones Drive, Suite 200 Austin, TX 78731-4280 Phone: 512.343.2544 Fax: 512.343.0119

REDACTED - FOR PUBLIC INSPECTION

VIA OVERNIGHT DELIVERY

Received & Inspected OCT 2 1 2013

October 14, 2013

FCC Mail Room

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, S.W. Washington, D.C. 20554

RE:

Annual Report for Conneaut Telephone Company Pursuant to 47 C.F.R. §54.313 and 54.422, WC Docket Nos. 10-90 and 11-42

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§ 54.313 and 54.422 Conneaut Telephone Company (the Company), Study Area Code 300606 is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS). Section 3005 of the Form 481 requires a privately-held rate of return carrier receiving high cost support to attach financial information pursuant to 47 C.F.R. § 54.313(f)(2). The Company maintains that the financial information is confidential and is submitting through ECFS a redacted document as an attachment for section 3005 of the FCC Form 481 in WC Docket Nos. 10-90 and 11-42.

Conneaut Telephone Company, by its authorized representative, hereby submits confidential information pursuant to 47 C.F.R. § 54.313(f)(2), under seal, subject to the Protective Order adopted November 16, 2012 in the above-named dockets.¹ The Company is providing to the Office of the Secretary the original and one copy of the cover letter and confidential information for WC Docket No. 10-90. There is no claim of confidentiality for any information related to WC Docket No. 11-42.

Two copies of this cover letter and confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, in accordance with the Protective Order.

No. of Copies rec'd 0+3 List ABODE

¹ FCC Record DA 12-1857



Marlene H. Dortch October 14, 2013 Page 2 of 2

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481.

Each page of the confidential submission bears the legend, "CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

An original and three copies of the redacted confidential information and cover letter are also being filed simultaneously with the non-redacted confidential information, in accordance with the August 6, 2013 Public Notice (DA 13-1707). The original and one copy are provided for WC Docket No. 10-90 and two additional copies are provided for WC Docket No. 11-42. The redacted version of the cover letter for this filing and each page of the filing is marked "REDACTED – FOR PUBLIC INSPECTION."

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

Lynette Hampton

Authorized Representative for Conneaut Telephone Company

Enclosures

cc:

Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission (2 hardcopies of non-redacted submission)

Mr. Ken Johnson, Conneaut Telephone Company

	m 481 - Carrier Annual Reporting Illection Form		FCC Form OMB Con July 2013		/OMB Control No. 3060-0819
<010>	Study Area Code	00606			
<015>	Study Area Name	CONNEAUT TEL CO			- Inspected
<020>	Program Year	2014	1	pecelved	
<030>	Contact Name: Person USAC should contact with questions about this data	Kenneth E. Johnson		OCT	51500
<035>	Contact Telephone Number: Number of the person identified in data line <030>	440-593-7151		FCC	8 Inspected 2 1 2013 Mail Room
<039>	Contact Email Address: Email of the person identified in data line <030>	kjohnson@suite224.net			
ANNUA	L REPORTING FOR ALL CARRIERS				54.313 54.422 Completion Required (check box when complete)
<100>	Service Quality Improvement Reporting		(complete attached worksheet)		(check box when complete)
<200> <210>	Outage Reporting (voice)	no outages to report	(complete attached worksheet)		1
<310>	Unfulfilled Service Requests (voice) Detail on Attempts (voice) Unfulfilled Service Requests (broadband) Detail on Attempts (broadband)	0	(attach descriptive document) (attach descriptive document)		
<400> <410> <420> <430> <440> <450>	Number of Complaints per 1,000 customers (voice) Fixed Mobile Number of Complaints per 1,000 customers (broad Fixed Mobile			0	Allin
<500> <510> <600> <610> <700> <710> <800> <1010> <1110> <1110>	Service Quality Standards & Consumer Protection F 3006060h510 Functionality in Emergency Situations 3006060h610 Company Price Offerings (voice) Company Price Offerings (broadband) Operating Companies and Affiliates Tribal Land Offerings (Y/N)? Voice Services Rate Comparability	(if ye:	(check to indicate certification) (attached descriptive document) (check to indicate certification) (attached descriptive document) (complete attached worksheet) (complete attached worksheet) (complete attached worksheet) (check to indicate certification) (attach descriptive document) t, check to indicate certification) (complete attached worksheet) (complete attached worksheet)		
<2000> <2005> <3000> <3005>	Rate of Return Carriers, Proceed to <u>ROR Additional</u>	ce Cap Local Exchange Ca	IFFIERS (check to indicate certification) (complete attached worksheet)		<u> </u>

(100) S Data C	(100) Service Quality Improvement Reporting Data Collection Form		FCC Form 481 OMB Centrol No. 3060-0986/OMB Centrol No. 3060-0819 July 2013
<010>	Study Area Code	300606	
<015>	Study Area Name	CONNEAUT TEL CO	
<020>	Program Year	2014	
<030>	Contact Name - Person USAC should contact regarding this data	Kenneth E. Johnson	
<032>		le <030> 440-593-7151	
<039>		ne <030> kjohnson@suite224.net	
<110>	Has your company received its ETC certification from the FCC?	(yes / no)	
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(a) "5 (yes / no) O O	
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.	ogress ng § nision of years, . If your company is a	
	Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.		Name of Attached Document (.pdf)
(113) (114) (115) (116) (117) (118)	Maps detailing progress towards meeting plan targets Report how much universal service (USF) support was received How (USF) was used to improve service quality How (USF)was used to improve service coverage How (USF) was used to improve service capacity Provide an explanation of network improvement targets not met in the prior calendar year.		

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age Reporting (Voice)	Form

- 1	<010> Study Area Code	300606
Stud	<015> Study Area Name	CONNEAUT TEL CO
Prog	<020> Program Year	2014
Con	<030> Contact Name - Person USAC should contact regarding this data	Kenneth B. Johnson
Con	<035> Contact Telephone Number - Number of person identified in data line <030> 440-593-7151	<030> 440-593-7151
Con	<039> Contact Email Address - Email Address of person identified in data line <030> kjohnson@suite224 .net	e <030> kjohnson@suite224.net

<ů>	Preventative	Procedures												
<g>></g>	Service Outage	Resolution												
\$	Did This Outage Affect Multiple Study Areas	(Yes / No)												
<e></e>	Service Outage Description (Check	all that apply)												
< 0 >	911 Facilities Affected	(Yes / No)				7	5							
<c5></c5>	Total Number of	Customers				odootto oo	- סבב מוומרוופת	rksneet						
<c1></c1>	Number of Total Number of							ρW						
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p3>	Outage End Date													j
<	Outage Start Outage Start Outage End													
401>	Outage Start Date													
< e >	NORS Reference Number													

Control No. 3060-0819									4	Total per line Rates and Fees												
FCC Form 481 OMB, Centrol No. 3060-0986/OMB Centrol No. 3060-0819 July 2013									<\$2>	Mandatory Extended Area Service Charge												
NO TO THE TOTAL TO									 b4>	State Universal Service Fee												
		r co		Johnson		.e224.net			<635	State Subscriber Line Charge					See attached worksheet							
	300606	CONNEAUT TEL CO	2014	Kenneth E. Johnson	<030> 440-593-7151	<030> kjohnson@suite224.net	1/1/2013		<522>	Residential Local					See att	-						
				ding this data	lentified in data line	dentified in data line	1/1		<01>	Rate Tyne												
2				contact regar	r of person id	ss of person ic	ctive Date	ervice Charge	CB3	CAC (CETC)	(2.12)											
(700) Price Offerings including Voice Rate Data Data Collection Form	de	me		Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Number of person identified in data line <030>	Contact Email Address - Email Address of person identified in data line <030>	Residential Local Service Charge Effective Date	Single State-wide Residential Local Service Charge	<42>	Cychange (IIEC)	(2001) 28 1000											
(700) Price Offerings in: Data Collection Form	Study Area Code	Study Area Name	Program Year	Contact Name	Contact Telepi	Contact Email	Residential Lo	Single State-w	<41>	Ctoto												
(700) Price Data Colle	<010>	<015>	<020>	<030>	<035>	<039>	<701>	<702>	<703>													

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<010>	<010> Study Area Code	300606
<015>	<015> Study Area Name	CONNEAUT TEL CO
<020>	<020> Program Year	2014
<030>	<030> Contact Name - Person USAC should contact regarding this data	Kenneth E. Johnson
<035>	<035> Contact Telephone Number - Number of person identified in data line <030	in data line <030> 440-593-7151
<039>	<039> Contact Email Address - Email Address of person identified in data line <030> kjohnson@suite224.net	() kjohnson@suite224.net

<d4> Usage Allowance Action Taken When Limit Reached {select }</d4>										
cd3> Usage Allowance (GB)										
cd2> Broadband Service - Upload Speed (Mbps)										
<41> Broadband Service - Download Speed (Mbps)										
CC Control of the con										
 			See attached	worksheet						
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FCC Form 481. OMB Control No. 3050-0986/OMB Control No. 3050-0819 July 2013											Doing Business As Company or Brand Designation			1001															
				u		24.net				<7€>	SAC		See attached worksheet	Non police															
	309006	CONNEAUT TEL CO	2014	data Kenneth E. Johnson	in data line <030> 440-593-7151	in data line <030> kjohnson@suite2							G G G																
800) Operating Companies Nata Collection Form	Study Area Code	Study Area Name	Program Year	Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Number of person identified in data line <030> 440-593-7151	Contact Email Address - Email Address of person identified in data line <030> kjohnson@suite224.net	Reporting Carrier CONNEAUT TEL CO	Holding Company	Operating Company	∢8)	Affiliates																		
800) Op	<010>	<015>	<020>	<030>	<035>	<039>	<810>	<811>	<812>	<813>		•	-	•	•	•	,	•	-	-	-	-			,	•	•	•	

T (006)	(900) Tribal Lands Reporting	ECC Form 481
Data Co	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	90900E
<015>	Study Area Name	CONNEAUT TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Kenneth E. Johnson
<035>	- 1	030> 440-593-7151
<039>	Contact Email Address - Email Address of person	identified in data line <030> kjohnson@suite224.net
<910>	Tribal Land(s) on which ETC Serves	
<920>	Tribal Government Engagement Obligation	
		Name of Attached Document (.pdf)
	If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:	
		Select
		(Yes,No,
		NA)
<921>	Needs assessmen	
	community anchor institutions;	
<922>	Feasibility and sustainability planning;	
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	
<925>	Compliance with Land Use permitting requirements	
<926>	Compliance with Facilities Siting rules	
<927>	Compliance with Environmental Review processes	
<928>	Compliance with Cultural Preservation review processes	
<929>	Compliance with Tribal Business and Licensing requirements.	

FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013		CONNEAUT TEL CO	2014	Kenneth E. Johnson	440-593-7151	Kjohnson@suite224.net				
	- 1	<015> Study Area Name	<020> Program Year	<030> Contact Name - Person USAC should contact regarding this data	<035> Contact Telephone Number - Number of person identified in data line <030>		Please check this box to confirm no terrestrial backhaul <1120> options exist within the supported area pursuant to § 54.313(G)	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)		

FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	300606	CONNEAUT TEL CO	2014	Kenneth E. Johnson	440-593-7151	kjohnsonssuite224.net	3006060h1210	Name of attached document (.pdf)					
(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	Study Area Code			l	1	1	<1210> Terms & Conditions of Voice Telephony Lifeline Plans	•	Link to Public Website	"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	• Details on the number of minutes provided as part of the plan,	<1223> Additional charges for toll calls, and rates for each such plan.
(1200) T. Lifeline Data Col	<010>	<015>	<020>	\$ 930 930	<032>	<039>	<1210>		<1220>		<1221>	<1222>	<1223>

FCC Form 481. OMB Control No. 3060-0819 May 2013					4	tal Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.											J.]			Name of Attached Document Listing Required Information
(2000) Price Cap Carrier Additional Documentation Data Collection Form Including Rate-bf-Return Carriers affiliated with Price Cap Local Exchange Carriers <0.010> Study Area Code 300606	Study Area Name CONNEAUT TEL CO	Program Year 2014	Contact Name - Person USAC should contact regarding this data Kenneth E. Johnson	Contact Telephone Number - Number of person identified in data line <030> 440-593-7151	Contact Email Address - Email Address of person identified in data line <030> kjohnson@suite224 .net	CHECK the boxes below to note compliance as a recipient of incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate. Incremental Connect America Phase I reporting 47 CFR § 54.313(b),(1) 48.54.313(b),(1) 49.54.313(b),(1) 49.54.313(b),(1)	Price Ca	2013 Frozen Support Certification		2015 Frozen Support Certification	2016 and future Frozen Support Certification	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)} Certification Support Used to Build Broadband	Connect America Phase II Reporting (47 CFR § 54.313(e))	3rd year Broadband Service Certification	5th year Broadband Service Certification	Interim Progress Certification			or CAP Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband	service in the preceding calendar year.	Interim Progress Community Anchor Institutions Name of Attached
(2000) P Data Co Including	<015>	<020>	<030>	<032>	<039>	CHECK t	,	<2012>	<2013>	<2014>	<2015>	<2016>		<2017>	<2018>	<2019>	<2020>				<2021>

FCC Form 481 Olyte Control No. 3060-0986/OMS Control No. 3060-0819 (ully 2013						compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.					(oh/se/)			[Ves/No]			I 🖸						3006060h3026
		r tel co		Kenneth E. Johnson	440-593-7151 kjohnson@suite224.net	i its five year service quality plan (pursuant to 47 CFR § 54.302(a)) and, for privately held carriers, ensuring compliance with the f CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.		Name of Attached Document Listing Required Information		Name of Attached Document Listing Required Information				Name of Attached Document Listing Required Information									Name of Attached Document Listing Required Information
3000) Rate of Return Carrier Additional Discumentation Sata Collection Form:	Study Area Code 300606	Study Area Name CONNEAUT	2014	Contact Name - Person USAC should contact regarding this data		low to note	Progress Report on 5 Year Plan	Milestone Certification (47 CFR § 54.313(f)(1)(i)) Please check this box to confirm that the attached PDF , on line 3012,	contains the required information pursuant to § 54.313 (f)[1][ii], as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.		is your company a Privately Held ROK Larret (4 CFR § 54.313(f)[2]) If Yes, does your company file the RUS amual report Please check these boxes to confirm that the aftached PDF, on line 3017, contains the required information pursuant to § 54.313(f)[2] compliance	reduires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation if the response is no on line 3014, Is your company audited?	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains	: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RMS Operating Report for Telecommunications PDF of Balance Sheet, Income Statement and Statement of Cash Flows	Management letter issued by the independent certified public accountant that performed the company's financial audit.	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)[2],	contains. Copy of their financial statement which has been subject to review by an independent certified public accountant, or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications	Borrowers, Underlying information subjected to a review by an independent certified in the contract of the con	prome accountain. Underlying information subjected to an officer certification.	PDF of Balance Sheet, Income Statement and Statement of Cash Flows	Attach the worksheet listing required information
3000) lets Co	<010>	<015>	<020>	9 6	<039>	CHECK		(3010)	(3011)	(3012)	(3014)	(3015)	(3016)	(3017)		(3019)	(3021)		(3022)	(3023)	(3024)	(3025)	(3026)

E	tion - Reporting Carr lection Form	FCC Form 481 OM8 Control No. 3060-0986/OM8 Control No. 3060-0819 July 2013
<010>	Study Area Code	300606
<015>	Study Area Name	CONNEAUT TEL CO
<020>	Program Year	2014
<030>	Contact Name - Pers	on USAC should contact regarding this data Kenneth E. Johnson
<035>	Contact Telephone N	umber - Number of person identified in data line <030> 440-593-7151
<039>	Contact Email Addre	ss - Email Address of person identified in data line <030> kjohnson@suite224.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the	he Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients
certify that I am an officer of the reporting carrier; my respond recipients; and, to the best of my knowledge, the information	nsibilities include ensuring the accuracy of the annual reporting requirements for universal service supp n reported on this form and in any attachments is accurate.
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:

E0000000000000000000000000000000000000	ion - Agent / Carrier ection Form	FCC Form 481 ; OMB Control No. 3060-0986/OMB Control No. 3060-0819 ; July 2013
<010>	Study Area Code	300606
<015>	Study Area Name	CONNEAUT TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USA	Should contact regarding this data Kenneth E. Johnson
<035>	Contact Telephone Number	Number of person identified in data line <030> 440 - 593 - 7151
<039>	Contact Email Address - Ema	il Address of person identified in data line <030> kjohnson@suite224.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

certify that (Name of Agent) <u>Lynette Hampton</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.										
Name of Authorized Agent: Lynette Hampton										
Name of Reporting Carrier: CONNEAUT TEL CO										
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 10/11/2013									
Printed name of Authorized Officer: Deanna Brown										
Title or position of Authorized Officer: CFO										
Telephone number of Authorized Officer: 440-593-7138										
Study Area Code of Reporting Carrier: 300606	Filing Due Date for this form: 10/15/2013									

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier									
, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service supp the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the inform									
Name of Reporting Carrier: CONNEAUT TEL CO		41 Land Co. 40 A 40							
Name of Authorized Agent or Employee of Agent: Lynette Hampton									
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date:	10/11/2013							
Printed name of Authorized Agent or Employee of Agent: Lynette Hampton									
Title or position of Authorized Agent or Employee of Agent Authorized Representative									
Felephone number of Authorized Agent or Employee of Agent: 512-343-2544									
Study Area Code of Reporting Carrier: 300606 Filing Due Date for this form: 10/1	15/2013								
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act 18 of the United States Code, 18 U.S.C. § 1001.	of 1934, 47 U.S.C. §§ 502, 503(b), or	fine or imprisonment under Title							

Attachments

LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE

The Conneaut Telephone Company complies with applicable service quality standards and consumer protection rules as required by the state regulatory commission and the Federal Communications Commission.

The rates, terms, and conditions under which the Company operates are outlined in its Local Exchange Tariff, which is approved by the state commission. The Company's tariff contains provisions regarding its customer service and protection practices, including resolving disputes with the Company, applying for service, the classification of business and residential rates, deposits, billing and payment for service, refusal, disconnection and cancellation of service. The tariff is available for customer review in the Business Office, as requested. Rates and terms of service are disclosed to customers upon application for service both verbally and in writing as part of a packet of information for new customers. Rates, applications and certain terms of service are also available on the Company's website.

Service quality standards are established by the state commission and the Company consistently meets or exceeds the standards and provides reports to the state commission, in accordance with the state commission's rules.

The protection of customers' privacy and information is of utmost importance and the Company has a policy and established operating procedures that comply with the FCC's Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011). Certification of the Company's compliance with CPNI rules and a description of the Company's operating procedures that ensure compliance are filed at the FCC annually.

REDACTED - FOR PUBLIC HIS PERIOD ON INSPECTED

OCT 2 1 2013

LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

FCC Mail Room

The Conneaut Telephone Company is able to function in emergency situations. The Company has a reasonable amount of back-up power to ensure functionality without an external power source. Standby power generators are supplied at the central office, remote switch sites, and repeater sites to ensure functionality without an external power source until power is restored. The network is capable of managing traffic spikes resulting from emergency situations.

The Company is able to reroute traffic around damaged facilities. Although the Company's ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

Received & Inspected
OCT 2 1 2013

LINE 1210 - TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE FEQ. Mail Room

Conneaut Telephone Company (the Company) offers Lifeline subscribers discounts to the monthly residential basic local exchange service rate. The local exchange service rate includes an unlimited amount of local calling minutes. Additional charges for toll calls associated with the stand-alone residential access line are billed at the rates of the long distance carrier chosen by the subscriber. Lifeline customers may subscribe to other packages and custom calling features at the standard rates offered to all customers. The Lifeline discount will apply to the portion of the package that is for basic local exchange service. The attached pages from the Company's tariff include the terms and conditions for Lifeline and the rates for local exchange service.

Conneaut Telephone Company Conneaut, Ohio

Section No. 1 Fourth Revised Sheet No. 2 Replaces Third Revised Sheet No. 2

P.U.C.O. NO. 7

EXCHANGE RATES

Received & Inspected
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The local calling area embraces all calls between stations bearing the designations of Conneaut, Kingsville and Pierpont.

FCC Mail Room

The classification and rates provided in this section apply at any point within the Base Rate Area which is defined as all territory in the exchange lying north of Route Interstate 90.

	Monthly	Max. Rate	Anniversary
	Rate		Date
Business - Primary Line	\$ 18.15 (I)	\$ 18.15 (I)	Aug. 1, 2012
Residence - Individual Line	\$13.05 (I)		Aug. 1, 2012
Payphone:	. ,		8,
Coin Operated Telephone Service Access Line	\$ 12.15		
Coin Supervision Additive	\$ 7.20		

The classifications and rates following apply at any point within Zone A which is defined as all territory in the exchange lying south of Route Interstate 90.

	Monthly	Max. Rate	Anniversary
	Rate		Date
Business - Primary Line	\$ 21.15 (I)	\$ 21.15 (I)	Aug. 1, 2012
Residence - Individual Line	\$ 16.05 (I)		Aug. 1, 2012
Payphone:	` '	()	,
Coin Operated Telephone Service Access Line	\$ 15.15		
Coin Supervision Additive	\$ 7.20		

Conneaut Telephone Company Conneaut, Ohio Section No. 5 Original Sheet No. 1

P.U.C.O. NO. 7

LIFELINE/LINK-UP REQUIREMENTS

A. GENERAL

- Lifeline shall be a flat-rate, monthly, primary access line service with touch-tone service or the Company may offer any other packages/bundles of service, if available to customers, less the lifeline discount and shall provide all of the following:
 - A recurring discount to the monthly basic local exchange service rate that provides for the maximum contribution of federally available assistance;
 - b. Not more than once per customer at a single address in a twelve-month period, a waiver of all nonrecurring service order charges for establishing service;
 - Free blocking of toll service, 900 service and 976 service;
 - d. A waiver of the federal universal service fund end user charge; and
 - e. A waiver of the telephone company's service deposit requirement.

B. REGULATIONS

- Lifeline Assistance is available to residential customers who are currently participating in one
 of the following federal or state low-income assistance programs that limit assistance based
 on household income:
 - Medical Assistance under Chapter 5111 of the Ohio Revised Code (Medicaid) or any state program that might supplant Medicaid;
 - Supplemental Nutritional Assistance Program (SNAP/Food Stamps);
 - Supplemental Security Income (SSI) under Title XVI of the Social Security Act;
 - d. Supplemental Security Insurance blind and disabled (SSD)
 - e. Federal public housing assistance, or Section 8;
 - f. Home Energy Assistance Programs (HEAP, LIHEAP, E-HEAP);
 - g. National School Lunch Program's Free Lunch Program (NSL);
 - h. Temporary Assistance for Needy Families (TANF/Ohio Works); or
 - i. General Assistance (including disability assistance (DA))

Conneaut Telephone Company Conneaut, Ohio

Section No. 5 Original Sheet No. 2

P.U.C.O. NO. 7

LIFELINE/LINK-UP REQUIREMENTS (Continued)

B. REGULATIONS (Continued)

- 2. Lifeline Assistance is available to residential customers whose total household income is at or below one-hundred fifty percent (150%) of the federal poverty level.
- 3. The Telephone Company shall require, as proof of eligibility for Lifeline Assistance, a document signed by the customer, certifying under penalty of perjury that the customer is receiving benefits from one of the programs identified in Section B.1 above; identify the specific program or programs from which the customer receives benefits and agree to notify the carrier if the customer ceases to participate in such program or programs. If a customer is applying for Lifeline based on income, see Section B.5.a-g for examples of income documentation.
- 4. The Telephone Company must verify Lifeline service eligibility for customers who qualify through household income-based requirements consistent with the FCC requirements in 47 C.F.R. 54.
- Consistent with federal law, examples of acceptable income documentation includes the following:
 - a. State or federal income tax return;
 - b. Current income statement or W-2 from an employer;
 - c. Three consecutive months of current pay stubs;
 - d. Social security statement of benefits;
 - e. Retirement/Pension statement of benefits;
 - f. Unemployment/Workmen's Compensation statement of benefits;
 - g. Any other legal document that would show current income (such as a divorce decree or child support document).
- 6. Customers qualifying for Lifeline with past due bills for regulated local service charges shall be offered special payment arrangements with the initial payment not to exceed \$25.00 before service is installed, with the balance for regulated local charges to be paid over six equal monthly payments. Lifeline service customers with past due bills for toll service charges shall have toll restricted service until such past due toll service charges have been paid or until the customer establishes service with a subsequent toll provider.
- 7. All other aspects of the state-specific lifeline service shall be consistent with the federal requirements. The rates, terms, and conditions for lifeline service shall be tariffed in accordance with Rule 4901:1-6-11.

Issued: May 12, 2011

Conneaut Telephone Company Conneaut, Ohio

Section No. 5 Original Sheet No. 3

P.U.C.O. NO. 7

LIFELINE/LINK-UP REQUIREMENTS (Continued)

B. REGULATIONS (Continued)

- 8. The Telephone Company shall provide written notification to the customer applying for Lifeline service that is determined ineligible for Lifeline service and shall provide an additional 30 days to prove eligibility.
- 9. The Telephone Company shall provide written customer notification if a customer's Lifeline service benefits are to be terminated due to failure to submit acceptable documentation for continued eligibility for that assistance. The lifeline customer shall have an additional sixty (60) days to submit acceptable documentation of continued eligibility or dispute the findings regarding termination of benefits.
- The Telephone Company shall establish procedures to verify an individual's continuing Lifeline eligibility for both program and income based criteria consistent with the FCC's requirements in 47 C.F.R. 54.409-54.410.

C. ENROLLMENT PROCESS

1. Existing Customers

- a. Customers with dial tone wanting to establish lifeline service should complete and submit a Company lifeline application, and provide documentation if applicable, within 15 business days of requesting the discount.
- b. The Company will review the customer's lifeline application to determine customer's eligibility within 15 days.
- c. If the customer is eligible for the lifeline discount, the Company will credit the customer's bill retroactive to the date of customer's request for lifeline service.
- d. If the customer does not return the application with the appropriate documentation, if required, within 15 business days, the customer will need to reapply for lifeline discounts. Should the Company determine that a customer does not qualify for lifeline assistance or if the customer submits incomplete documentation, the Company will provide written notification to the customer and give the customer an additional 30 days to prove eligibility. If after that additional 30 days the customer has failed to prove eligibility or provide the necessary documentation, the customer must re-apply for the lifeline discounts,

2. New Customers

- a. Customers applying for new service and requesting to establish lifeline service should complete and submit a Company lifeline application, and provide documentation if applicable, within 15 business days of requesting the discount. The Company will process the lifeline application without delaying the installation of new service.
- b. The Company will review the customer's lifeline application to determine the customer's eligibility within 15 days.

Issued: May 12, 2011

Conneaut Telephone Company Conneaut, Ohio

Section No. 5 Original Sheet No. 4

P.U.C.O. NO. 7

LIFELINE/LINK-UP REQUIREMENTS (Continued)

C. ENROLLMENT PROCESS (Continued)

- 2. New Customers (Continued)
 - c. If the customer is eligible for the lifeline discount, the Company will credit the customer's bill for installation charges and the monthly discount retroactive to the date the customer's service is established.
 - d. If the customer does not return the application with the appropriate documentation, if required, within 15 business days, the customer will need to reapply for lifeline discounts. Should the Company determine that a customer does not qualify for lifeline assistance or if the customer submits incomplete documentation, the Company will provide written notification to the customer and give the customer an additional 30 days to prove eligibility. If after that additional 30 days the customer has failed to prove eligibility or provide the necessary documentation, the customer must re-apply for the lifeline discounts.

D. INCOME ELIGIBILITY

- The Telephone Company must verify through acceptable documentation that a customer qualifies for Lifeline Assistance. Such verification must be performed within 60 days of a customer's service establishment. Examples of income documentation are identified in Section B.5.a-g.
- 2. Regardless of when the Company completes the verification process Lifeline benefits shall go back to the date the qualified customer established lifeline.
- The Telephone Company shall provide written notification to customers that do not qualify for Lifeline Assistance. The notice shall give the customer an additional 30-day opportunity to prove eligibility or dispute the company's determination.
- 4. Written notification must include: 1) the earliest date termination of lifeline benefits will occur if the customer has been receiving the benefits or the last date the customer has to provide documentation to prove eligibility to receive the benefits; 2) the reason(s) for termination of lifeline benefits and any actions which the customer must take to demonstrate continued eligibility; 3) contact information for the Telephone Company; and 4) a statement explaining who customers may contact in the event of a dispute.
- 5. If a customer disagrees with a company's findings regarding eligibility for Lifeline Assistance, the customer may file an informal/formal complaint with the Public Utilities Commission of Ohio.

Issued: May 12, 2011

Conneaut Telephone Company Conneaut, Ohio Section No. 5 Original Sheet No. 5

P.U.C.O. NO. 7

LIFELINE/LINK-UP REQUIREMENTS (Continued)

E. VERIFICATION FOR CONTINUED ELIGIBILITY

- 1. The Telephone Company must notify customers at least 60 days prior to the company's pending termination of the customer's Lifeline Assistance if the customer fails to submit acceptable documentation for continued eligibility for benefits. Such notice will be separate from the bill and will include: 1) the earliest date termination of lifeline benefits would occur, 2) the reason(s) for termination of lifeline benefits and any actions which the customer must take to demonstrate continued eligibility; 3) contact information for the telephone company and 4) a statement explaining who the customer should contact in the event of a dispute.
- 2. Should a customer fail to submit proper documentation within the 60 day period, the Telephone Company will terminate the customer's lifeline benefits and require the customer to re-apply.

Issued: May 12, 2011

Received & Inspected

OCT 2 1 2013

FCC Mall Room

THE CONNEAUT TELEPHONE COMPANY and Wholly Owned Subsidiary

FINANCIAL STATEMENTS
AND
SUPPLEMENTAL INFORMATION

Years Ended December 31, 2012 and 2011

Demarchi & Associates Certified Public Accountants 925 Euclid Avenue - Suite 636 Cleveland, Ohio 44115-1405 Phone (216) 241-6975 Fax (216) 241-6978

Independent Auditors' Report

Board of Directors
The Conneaut Telephone Company
Conneaut, Ohio

We have audited the accompanying consolidated balance sheets of THE CONNEAUT TELEPHONE COMPANY and its wholly owned subsidiary, Cable Suite 541, Inc., as of December 31, 2012, and 2011, and the related consolidated statements of income, retained earnings, and cash flows and accompanying schedules, for the years then ended. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We did not audit the financial statements of the Ohio RSA 3 limited partnership, in which the Company owns a minority interest. The Company's investment in this partnership, on the equity basis, reflects total assets of \$ 1, 2012 (\$ 10, 2011), and income of \$ 1, 2012 (\$ 10, 2011). The financial statements of this partnership were audited by other auditors whose reports have been furnished to us. Our opinion, insofar as it relates to the amounts included for the partnership investment at December 31, 2012 and the income for the year then ended, is based solely on the reports of the other auditors.

We conducted our audits in accordance with U.S. generally accepted auditing standards. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the 2012 and 2011 consolidated financial statements, referred to above present fairly, in all material respects, the financial position of THE CONNEAUT TELEPHONE COMPANY and its wholly owned subsidiary as of December 31, 2012 and 2011, and the results of their operations and its cash flows for the years then ended in conformity with U.S. generally accepted accounting principles.

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Our audit was conducted for the purpose of forming an opinion on the basic financial statements taken as whole. The supplemental information presented on pages 24 through 33 is presented for purposes of additional analysis and is not a required part of the basic financial statements. Such information has been subjected to the procedures applied in the audit of the basic financial statements and, in our opinion, is fairly stated in all material respects in relation to the basic financial statements taken as whole.

June 19, 2013

REDACTED - FOR PUBLIC INSPECTION BALANCE SHEETS

2012

2011

THE CONNEAUT TELEPHONE COMPANY and Wholly Owned Subsidiary

December 31, 2012 and 2011

ASSETS

Current Assets:

Cash on Hand Cash in Bank

Subtotal

Accounts Receivable - Telecommunications

(Less allowance of \$ and \$

Accounts Receivable - Other

Materials and Supplies Inventory

Prepaid Expenses

Unamortized Refinancing Cost (Note 2B)

Total Current Assets

Non-Current Assets:

Deferred Tax Regulatory Assets (Notes 2 A and 7 A 1)
Unamortized Refinancing Cost (Note 2B)
Total Non-Current Assets

Other Assets:

Investment in Cellular Limited Partnership (Note 3B)
Investment in Rural Tel. Finance Corp. Certificate (Note 15)
Total Other Assets

Plant. Property, and Equipment:

Plant in Service (Note 4)

Less: Accumulated Depreciation and Amortization

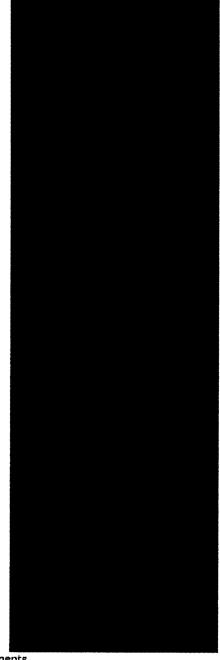
Net Plant in Service

Add: Plant Under Construction

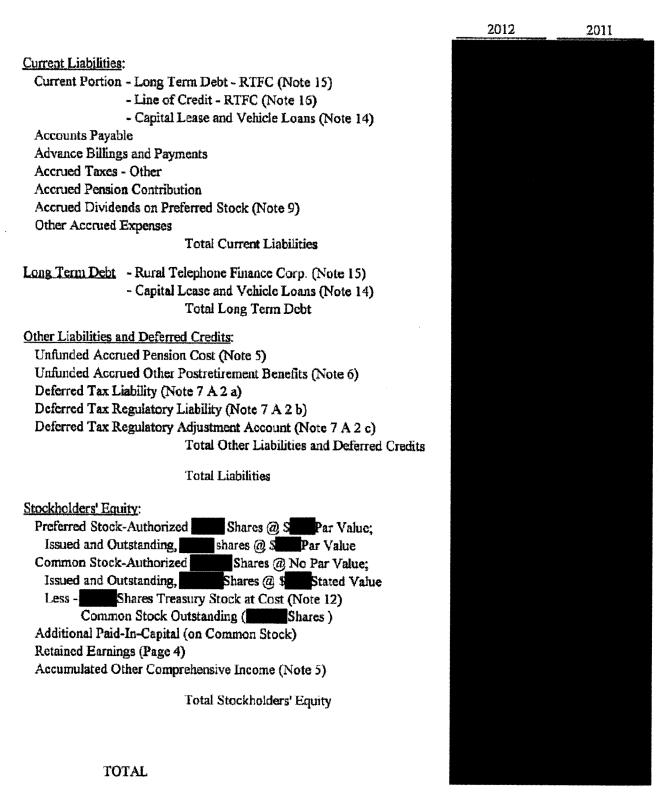
Non-Operating Plant

Net Plant, Property, & Equipment

TOTAL



LIABILITIES AND STOCKHOLDERS' EQUITY



STATEMENTS OF INCOME

THE CONNEAUT TELEPHONE COMPANY and Wholly Owned Subsidiary

Years Ended December 31, 2012 and 2011

Increase

Operating Revenues (Page 31)

Local Network Services Revenue

Network Access Services Revenue

Long Distance Network Services Revenue

Miscellaneous Revenue

Less - Uncollectible Revenues

Total Operating Revenues - Regulated

Operating Expenses (Pages 32 and 33)

Plant Specific Operations

Plant Nonspecific Operations

Customer Operations

Corporate Operations

Depreciation and Amortization

Total Operating Expenses - Regulated

Operating Taxes

Federal Income Tax - Current Expense (Credit) (Note 7 B)

- Deferred Expense (Note 7 B)

Other Operating Taxes (Note 19)

Total Operating Taxes - Regulated

Operating Income (Loss) Before Interest - Regulated

Less - Interest Expense on Long Term Debt

Operating Loss - Regulated

Other Income (Expense) - Net (Page 33)

Loss from Regulated Operations

Nonregulated Income (Loss)

Net Income (Loss) - Cellular (Page 24)

Net Income - Internet Operations (Page 25)

Net Loss - Cable Suite 541 (page 27)

Other Income & (Expenses) - Deregulated (Page 28)

Total Nonregulated Net Income

NET LOSS

2012 2011 (Decrease)

STATEMENTS OF RETAINED EARNINGS

THE CONNEAUT TELEPHONE COMPANY and Wholly Owned Subsidiary

Years Ended December 31, 2012 and 2011

BALANCE AT BEGINNING OF YEAR

Add: Prior Period Adjustment (Note 8)

ADJUSTED BALANCE AT BEGINNING OF YEAR

Less: Net Loss for the Period (Page 3)

Subtotal

Less: Dividends on Preferred Stock (Note 9)

Dividends on Common Stock

Total Dividends

BALANCE AT END OF YEAR - CONSOLIDATED

BOOK VALUE PER SHARE (NOTE 10)

EARNINGS (LOSS) PER SHARE (NOTE 11)

STATEMENTS OF CASH FLOWS

THE CONNEAUT TELEPHONE COMPANY and Wholly Owned Subsidiary

Years Ended December 31, 2012 and 2011

CASH FLOWS FROM OPERATING ACTIVITIES:

Cash Received from Customers, etc.
Interest, Dividends and Capital Gains - net
Interest Paid
Cash Paid to Suppliers, Employees and Relative Expenses
Taxes Paid
Net Cash Provided by Operating Activities

CASH FLOWS FROM INVESTING ACTIVITIES:

Acquisition of Fixed Assets

Distributions from Partnerships - Cellular
- Bright Net

Net Proceeds (Increase) from RTFC Certificate

Net Cash Provided (Used) by Investing Activities

CASH FLOWS FROM FINANCING ACTIVITIES:

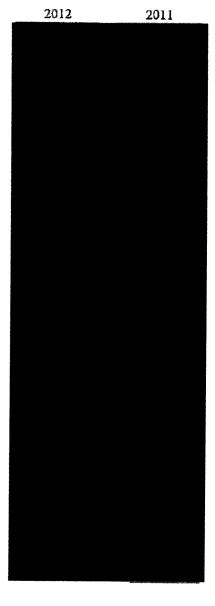
Proceeds from New RTFC Refinanced Loan
Payoff of former RTFC Term Loan
Principal Payments - RTFC Term Loans
- RTFC Line of Credit
- Capital Lease & Vehicle Loans

Payoff of Vehicles before Sale & Leaseback
Proceeds from RTFC Line of Credit
Dividend Payments
Net Cash Used by Financing Activities

NET INCREASE (DECREASE) IN CASH AND CASH EQUIVALENTS

Cash and Cash Equivalents at Beginning of Year

CASH AND CASH EQUIVALENTS AT END OF YEAR



STATEMENTS OF CASH FLOWS (Cont'd)

THE CONNEAUT TELEPHONE COMPANY and Wholly Owned Subsidiary

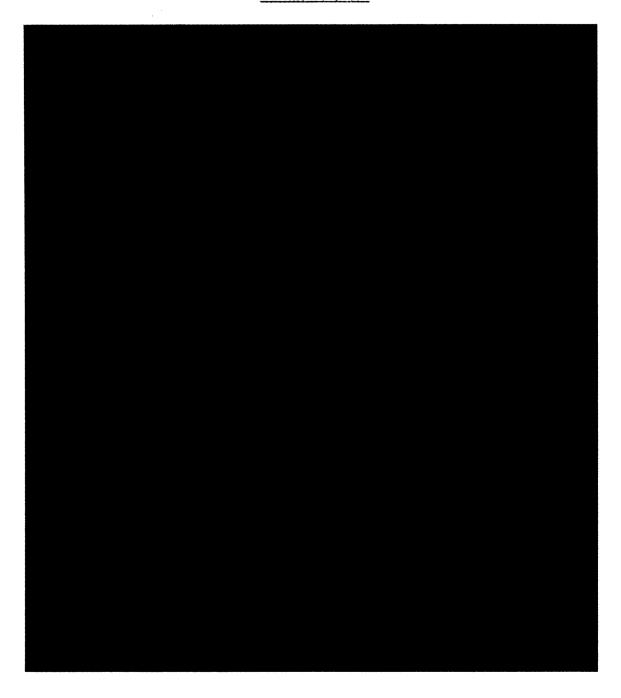
Years Ended December 31, 2012 and 2011

2012 2011 RECONCILIATION OF NET INCOME TO NET CASH PROVIDED BY OPERATING ACTIVITIES: Net Income (Loss) (Page 3) Adjustments to Reconcile Net Income and Net Cash Provided by Operating Activities: **Depreciation and Amortization** Non-Cash - Partnership (Income) Loss - Cellular Non-Cash - Loss on Vehicle Sale/leaseback Non-Cash - Treasury Stock Pension Contribution Decrease in Receivables (Increase) Decrease in Prepaid Items (Increase) in Unamortized Financing Costs Decrease in Materials & Supplies Inventory Increase (Decrease) in Deferred Tax Asset/Liability Increase (Decrease) in Accounts Payable Increase in Advance Billings Increase (Decrease) in Accrued Taxes Increase in Accrued Dividend Payable Increase (Decrease) in Accrued Pension Contribution-Net Increase (Decrease) in Other Accrued Expenses Pension Expense - Non Cash Increase (Decrease) in Accrued Retirement Health Benefits-Noncast Other Post Retirement Benefit Payments Made Other Comprehensive Income Non-Cash Adjustments Other Non-Cash Adjustments **Total Adjustments** TOTAL CASH PROVIDED BY OPERATING ACTIVITIES

NOTES TO FINANCIAL STATEMENTS

The Conneaut Telephone Company

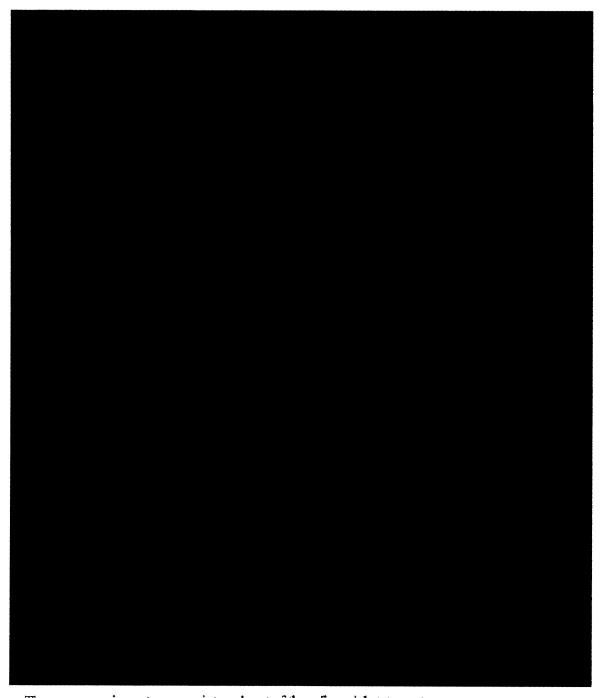
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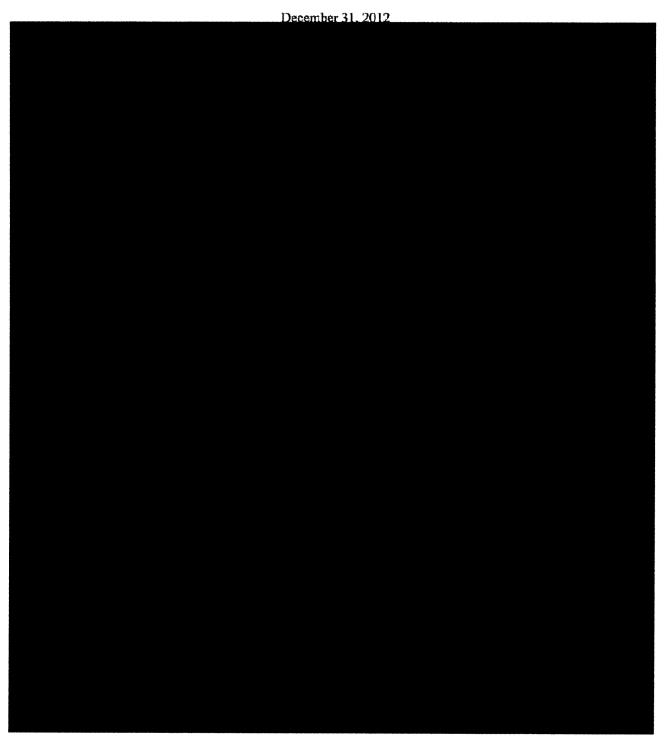
NOTES TO FINANCIAL STATEMENTS

The Conneaut Telephone Company

December 31, 2012



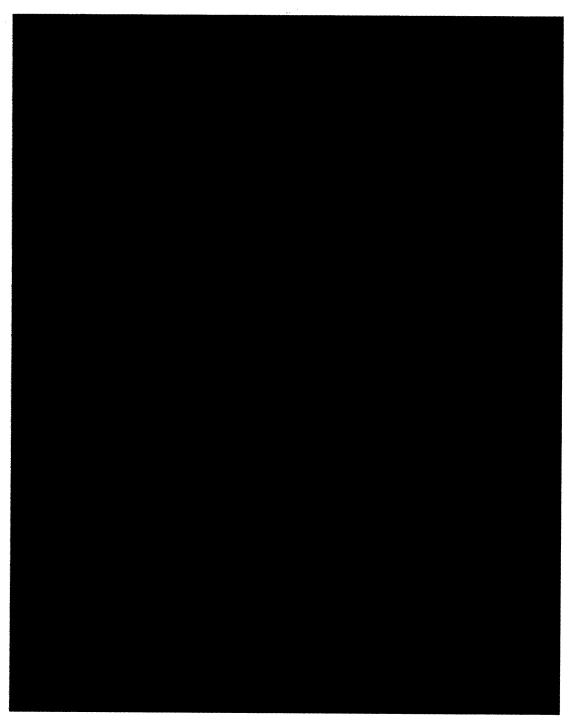
The Conneaut Telephone Company



NOTES TO FINANCIAL STATEMENTS

The Conneaut Telephone Company

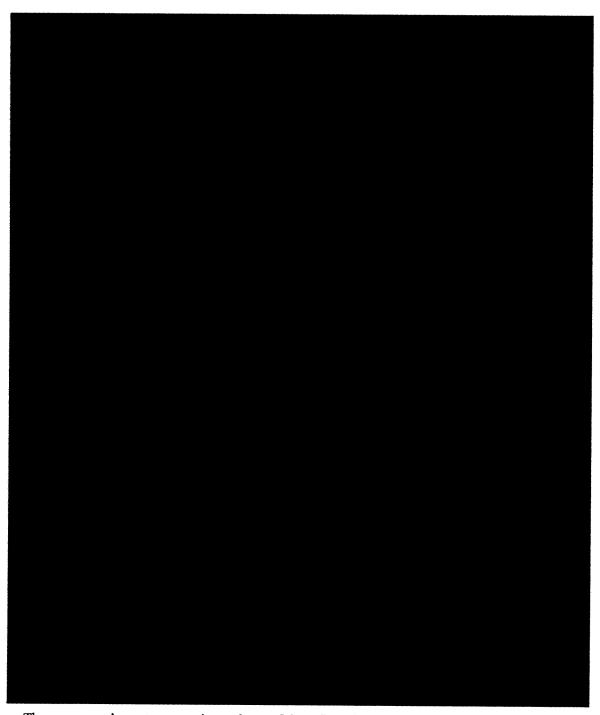
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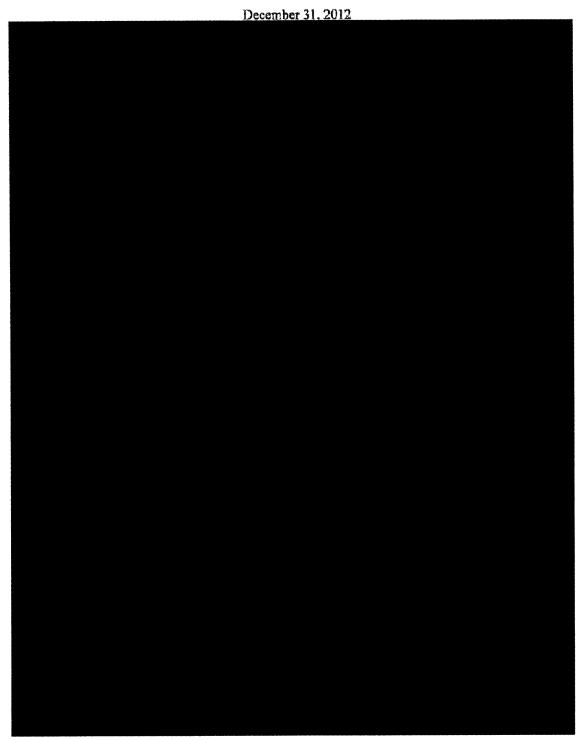
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The Conneaut Telephone Company

December 31, 2012

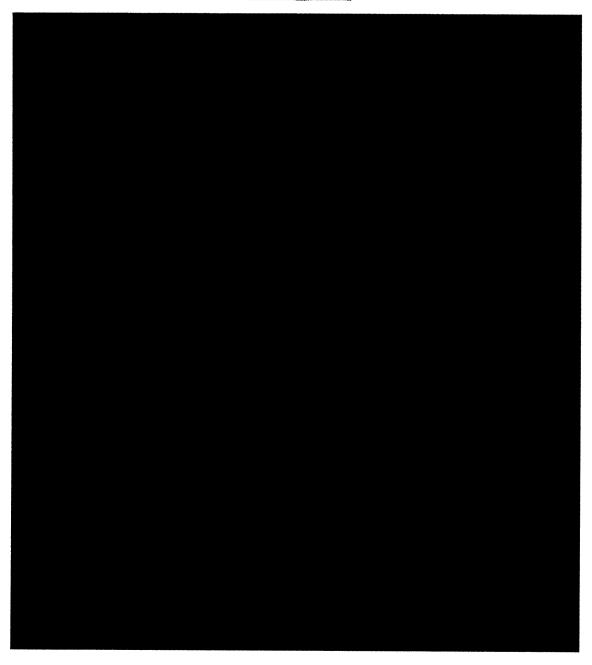


The Conneaut Telephone Company



NOTES TO FINANCIAL STATEMENTS

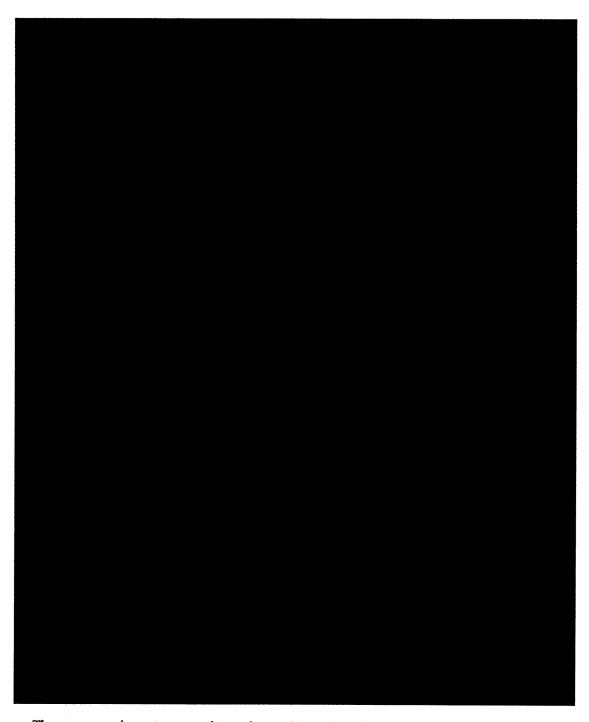
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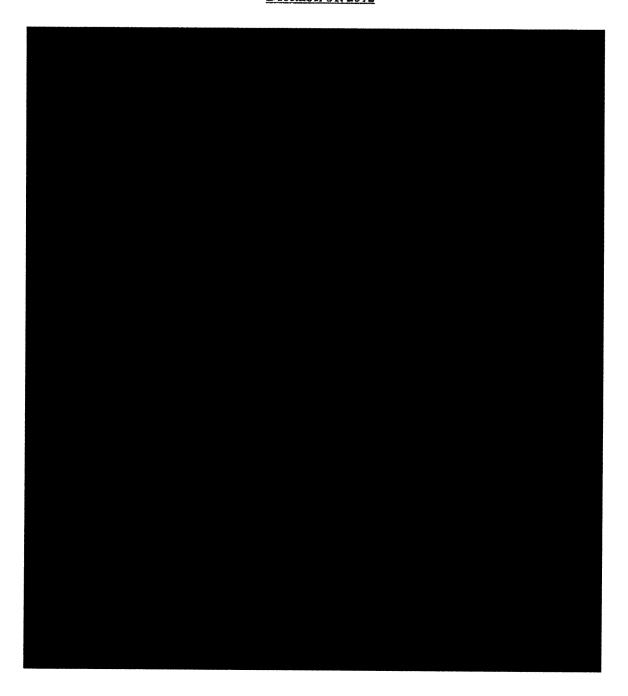
The Conneaut Telephone Company

December 31, 2012



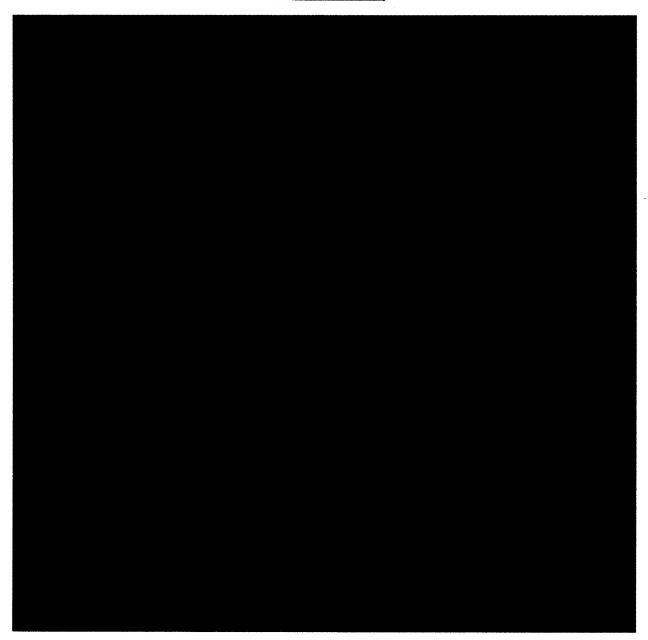
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The Conneaut Telephone Company



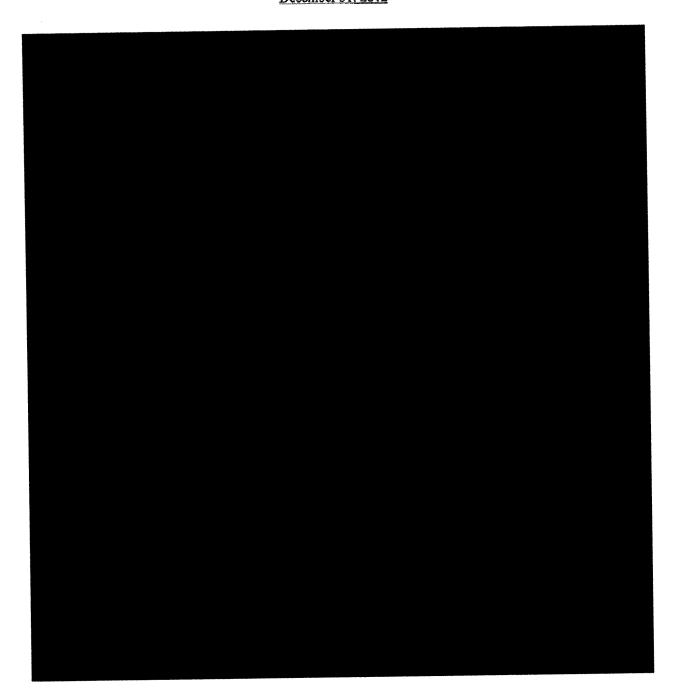
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The Conneaut Telephone Company



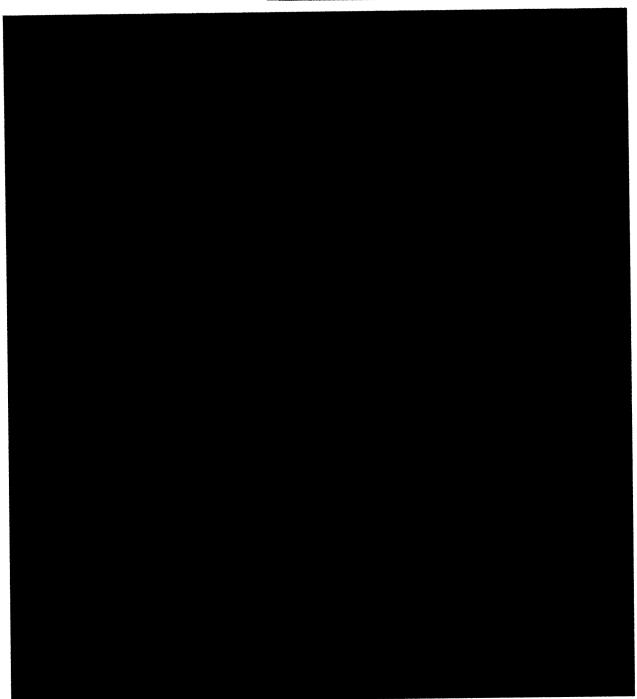
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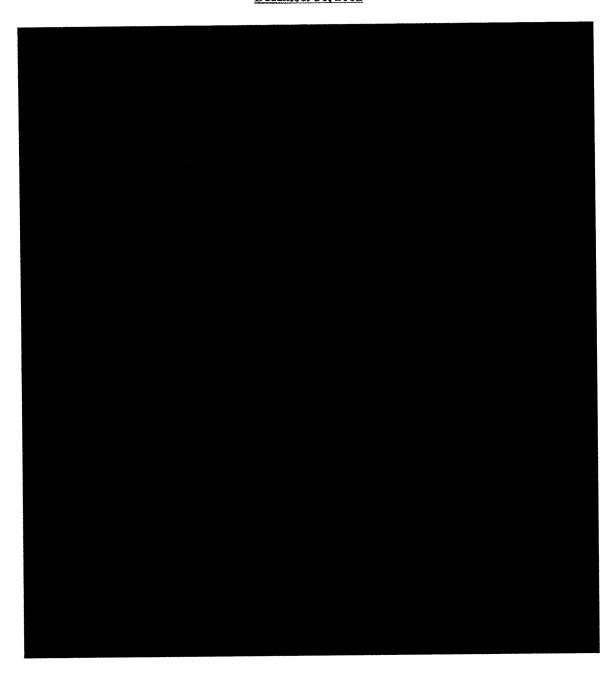
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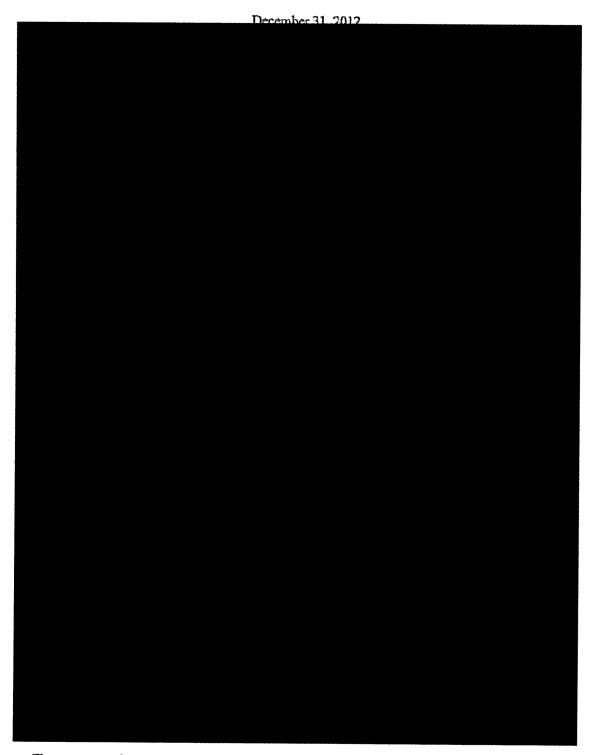


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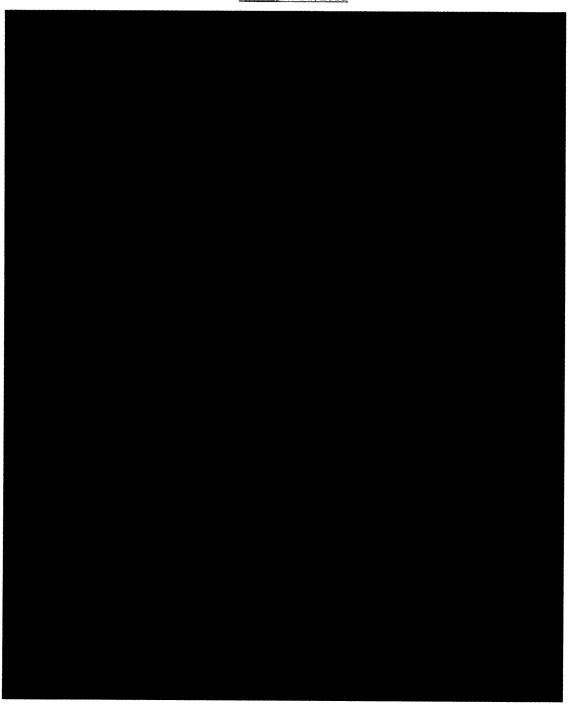


The Conneaut Telephone Company



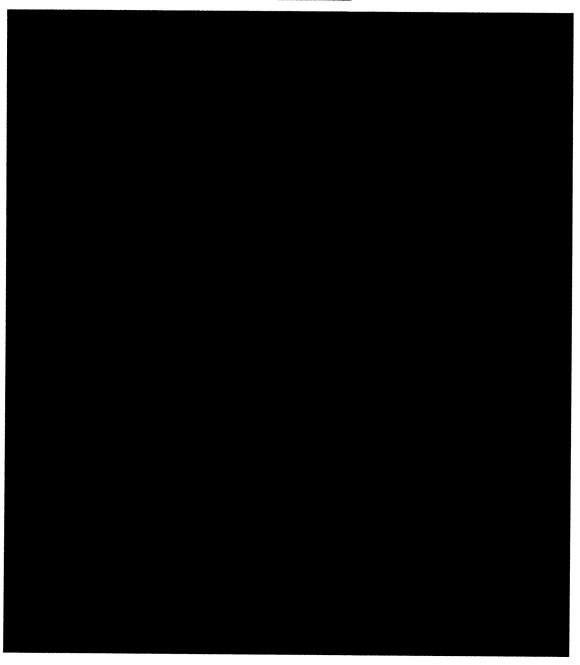
The Conneaut Telephone Company

December 31, 2012



NOTES TO FINANCIAL STATEMENTS

The Conneaut Telephone Company



NOTES TO FINANCIAL STATEMENTS

The Conneaut Telephone Company

